

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA Plaintiff, v. HENRY JOSE SEGUARA SALINA Defendant.	Criminal no. 20-063 (PAD)
---	---------------------------

MOTION FOR FRYE HEARING

TO THE HONORABLE COURT:

Comes now the defendant, Mr. Henry J. Segura Salina, and respectfully states and prays as follows:

1. As the Court is aware, the Government has extended its final offer.
2. A co-defendant meeting was held at MDC on X, and after discussing the particulars of this case, a counteroffer was presented to the government to resolve this matter forthwith.
3. The Government informed the defendant that it was rejecting the counteroffer but was still keeping the offer available if the defendant was interested.
4. At the latest status conference, the undersigned informed the Court that Mr. Segura Salina was not accepting nor rejecting the government's offer, and was not informing if he wanted to proceed or not to trial. (See Docket Entry #108)
5. The undersigned requests that the Court schedules an in-person *Frye* hearing to discuss on the record with Mr. Segura Salina the particulars of the plea agreement and ensure that Mr. Segura Salina understands its terms.

WHEREFORE, Mr. Segura Salina respectfully requests that this motion is granted and that the Court sets a Frye hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of May 2022.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

S/ Diego H. Alcalá Laboy
Diego H. Alcalá Laboy
PO Box 12247
Tel.: (787) 432-4910
USDC-PR No. 300504
dalcala@defensorialegal.com